

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

In The Matter Of:	)	
	)	Case Number 10-40845-abf
Larry Gene Maddox	)	
Shelly Renee Maddox	)	
	)	Chapter 13
Debtors,	)	
	)	
Green Tree Servicing LLC	)	
	)	
Creditor,	)	
	)	

Property Address: 13701 E Harvest Ln, Peculiar, MO 64078

Account number: XXXX8292

Court Claim Number: 5

**RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

As contemplated by Fed. R. Bankr. Proc. 3002

**Green Tree Servicing LLC** ("Creditor") hereby responds to that certain Notice of Final Cure Payment dated **April 20, 2015** and filed as Docket Number **88**

**Pre-Petition Default Payments**

- ☒ Agrees that the full amount required to cure the default on the Creditor's claim has been paid.
- ☐ Disagrees that the full amount required to cure the default on the Creditor's claim has been paid and states the total amount due to cure pre-petition arrears is:

Total Amount Due:

**Post-Petition Default Payments**

- ☐ Agrees the loan is current with respect to all payments consistent with Section 1322(b)(5) of the Bankruptcy Code.
- ☒ Disagrees that the loan is current with respect to all payments consistent with Section 1322(b)(5), and states that the total amount due to cure the post petition arrears is:

Total Amount Due: \$491.43

Attached as an Exhibit is an itemized account of the post-petition amounts that remain unpaid as of the date of the Cure Notice. The amounts outstanding identified do not reflect amounts that become due or may become due after the date of the Cure Notice, including any fees that may have been incurred in the preparation, filing, or prosecution of this Response to the Cure Notice.

The amounts identified as due on this response may not, due to timing, reflect all payments sent to the Creditor as of the date of the Cure Notice. In addition, the amounts due may include payments reflected in the Cure Statement but which have not yet been received and/or processed by the Creditor.

July 9, 2015

Respectfully Submitted,  
Millsap & Singer, LLC

/s/ William T. Holmes, II  
Cynthia M. Woolverton, #47698  
William T. Holmes, II, #59759  
Benjamin C. Struby, #56711  
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St. Louis, MO 63005  
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Attorneys for Green Tree Servicing LLC

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on July 9, 2015, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court pursuant to CM/ECF as set out on the Notice of Electronic filing as issued by the Court or in the alternative has been served by depositing a true and correct copy of same enclosed in a postage prepaid, properly addressed envelope, in a post office official depository under the exclusive care and custody of the United States Postal Service within the state of Missouri on those parties directed by the Court on the Notice of Electronic Filing issued by the Court as required by the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court.

/s/ William T. Holmes, II

**Electronic Mail Notice List**

The following is the list of attorneys who are currently on the list to receive e-mail notices for this case.

Neil S. Sader

Richard Fink

Office of the United States Trustee

**Manual Notice List**

The following is a list of parties who are not on the list to receive e-mail notices for this case (who therefore require manual noticing).

Larry Gene Maddox  
Shelly Renee Maddox  
13701 E Harvest Lane  
Peculiar, MO 64078